

1099 NEW YORK AVENUE, NW SUITE 900 WASHINGTON, DC 20001-4412

JENNER & BLOCK LLP

August 21, 2020

Matthew L. Haws
Tel +1 202 639 6065
mhaws@jenner.com

Hon. Claude M. Hilton
United States District Court for the Eastern District of Virginia
Albert V. Bryan U.S. Courthouse
401 Courthouse Square
Alexandria, VA 22314

Re: *UMG Recordings, Inc. et al v. Kurbanov, et al*, Case No. 1:18-cv-00957

Dear Judge Hilton:

By order dated August 4, 2020, the Court scheduled a status conference in the above-captioned matter to be held in Courtroom 800 in the Alexandria Division courthouse. ECF No. 44. In light of the ongoing COVID-19 pandemic, the parties respectfully request that the Court hold this status conference via tele-conferencing or video-conferencing. In addition to the challenges associated with an in-person conference, both parties are represented in part by pro hac vice counsel (or counsel with pending pro hac vice applications) who reside outside of the Eastern District of Virginia. In order to facilitate the most efficient and effective status conference, these attorneys will need to participate in the conference and anticipate that travel under current conditions will be particularly difficult. The parties thus respectfully submit that holding the upcoming status conference remotely will be the safest and most efficient way to ensure that counsel can participate fully and apprise the Court of the status of their dispute.

Respectfully submitted,

/s/ Jeffrey H. Geiger
Jeffrey H. Geiger (VSB No. 40163)
SANDS ANDERSON PC

/s/ Matthew L. Haws
Matthew Lloyd Haws (VSB No. 48368)
Jenner & Block LLP

August 21, 2020

Page 2

111 E. Main Street, Suite 2400
Bank of America Plaza
P.O. Box 1998 (23218)
Richmond, Virginia 23218-1998
Telephone: (804) 783-7248
Facsimile: (804) 783-7291
jgeiger@sandsanderson.com
Counsel for Defendants

Valentin D. Gurvits (*pro hac vice*)
Matthew Shayefar (*pro hac vice*)
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Telephone: (617) 928-1804
Facsimile: (617) 928-1802
vgurvits@bostonlawgroup.com
matt@bostonlawgroup.com

Evan Fray-Witzer (*pro hac vice*)
CIAMPA FRAY-WITZER, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Telephone: (617) 426-0000
Facsimile: (617) 423-4855
Evan@CFWLegal.com

1099 New York Ave., NW
Suite 900
Washington, DC 20001-4412
Telephone: (202) 639-6065
Facsimile: (202) 639-6066
Email: mhaws@jenner.com
Counsel for Plaintiffs

Ian Heath Gershengorn (*pro hac vice pending*)
Jenner & Block LLP
1099 New York Ave., NW
Suite 900
Washington, DC 20001-4412
Telephone: (202) 639-6869
Facsimile: (202) 639-6066
Email: igershengorn@jenner.com

Alison I. Stein (*pro hac vice*)
Jenner & Block LLP
919 Third Ave.
New York, NY 10022-3908
Telephone: (212) 891-1622
Facsimile: (212) 891-1699
Email: astein@jenner.com

Jonathan A. Langlinais (*pro hac vice*)
Jenner & Block LLP
1099 New York Ave., NW
Suite 900
Washington, DC 20001-4412
Telephone: (202) 637-6333
Facsimile: (202) 639-6066
jalanglinais@jenner.com